

The Law Office of Ryan Lozar, P.C.
305 Broadway, 10th Floor, New York, NY 10007
Tel: (310) 867-1562; Alternate Tel: (646) 666-8262; Fax 1-877-666-4456
ryanlozar@gmail.com
www.ryanlozar.com/www.luchaportusderechos.com



September 9, 2016

Re: Daniels, et al. v. City of N.Y., et al., No. 16 Civ. 190 (PKC) (JO)

Dear Judge Orenstein:

I am Plaintiffs' counsel in the above-captioned Section 1983 action. I write to provide you with the Parties' joint status report in advance of the September 14, 2016, conference. The Court's operative Scheduling Order contemplates the close of all discovery on October 31, 2016. Docket No. 20. The Parties believe that they will be able to meet this deadline using the control dates set forth in this letter and the Court's assistance as disputes arise.

Defendants made a large document production in August 2016 and Plaintiffs filed a deficiency letter that same month. The Parties have conferred about disputes arising from that deficiency letter, resolved many, and Plaintiffs will file a letter motion to compel addressing one of the remaining disputes later today.

Document Production

As for the documents that the Parties agree that Defendants will produce so long as the documents exist, the Parties aspire to have this production done by September 30, 2016. The categories of records that the Parties agree will be produced by September 30, 2016 are remaining documents pertaining to the execution of the search warrant at 192 Sands St. Apt. No. 12B, Brooklyn, New York on July 17, 2014 and Plaintiffs' subsequent arrest, property recovered from Plaintiff Anthony Wade, and relevant disciplinary information for the individually-named Defendant Officers, subject to limitations set forth in Defendants' Responses to Plaintiffs' Document Requests and Interrogatories. Although the Parties expect that production of this material will be without any problem, we will promptly raise any unresolvable disputes with the Court.

Depositions

Defendants' counsel will take Plaintiffs' depositions in September 2016. Beginning in the first week of October 2016, Plaintiff's counsel will begin to take Defendants' depositions. The Parties do not expect to notice expert witnesses.

The Parties remain ready to provide the Court with additional information as requested, and look forward to Tuesday's conference.

Thank you,



Ryan Lozar